Appl.No.: 09/842,955

Amendment dated October 12, 2004

Response to Office Action mailed July 9, 2004

REMARKS/ARGUMENTS

Claims 1-8 are pending in the application with claims 1-2 rejected, claims 3-4 objected to, and claims 5-8 allowed. Reexamination and reconsideration are hereby requested.

Claims 1-2 were rejected as anticipated by Ueno. The Examiner pointed to Figs.1-2 and column 7, lines 13-17.

Applicants reply that Ueno performs motion compensation which compares blocks of a frame with shifted (by candidate motion vectors) blocks of a prior frame, and determines the motion vector for a block by minimization of prediction error which typically is the sum of absolute differences over all pixels in the block. Ueno is not explicit about "prediction error" measurement, although block-based MPEG and H.261 are mentioned. The cited portion of Ueno has two approaches: either (i) a lowpass filter which changes from block to block (column 7; lines 17-20) or (ii) adding the frame to the predicted frame instead of filtering (column 7, lines 20-28). Thus approach (i) appears to be block-based. In contrast, claim 1 requires pixel-based lowpass filtering and thus is not suggested by Ueno.

Claim 3 has been rewritten to include the limitations of parent claims 1-2.

Respectfully submitted.

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